From: Blend, Jeff
To: Tina Laidlaw/MO/R8/USEPA/US@EPA
Cc: LaVigne, Paul; Suplee, Mike
Subject: Talking point
Date: 09/02/2011 08:04 AM

Tina:

Should I include Dave Clark on this email? Several things that need to be answered/stated

1) We know that the WERF numbers are an underestimate because WERF level 5 is not as stringent as our nutrient standards for N (but is slightly more stringent than ours for P). TN for us is 0.3 mg/l and for WERF level 5 is 1 mg/l. But, let us not go there for reasons Tina gave us...
2) The O&M costs do not include labor and maintenance. If maintenance in particular is a large part of the cost of a plant, then Helena, Havre and Kalispell might be pushed over 2%. However, I doubt that since those plants are large and would have large capital and chemical costs. But maybe... we should check on that. As it stands, Helena is 1.72 MHI, Kalispell 1.83 and Havre 1.89 to get to estimate base criteria. So, none of them are too far from triggering 2%.
3) Can we just ignore Missoula since they meet criteria with their mixing zone. Should we take them out of this study, or leave them in?
4) For Lolo and Stevensville, I need current user rates, design flow, actual flow and what WERF level they are currently at for nutrient removal. Paul and Tina, if you could work out who can get what, I could really use the info ASAP. Otherwise, it delays the draft that I give to Tina. Those are the last two towns that I am willing to add, unless we want to push the date of this things back (but we can't, given promises we made yesterday). Please, no more towns.
5) For towns at risk of not being able to meet the general variance and thus possibly applying for an individual variance, we could include the ten advanced dischargers at less than 1 MGD. I only know five off the top of my head: Columbia Falls, Manhattan, Lolo, Stevensville and Colstrip. Columbia Falls is already at variance levls, so they would take the variance. Larger systems that have a high cost to just get to a variance level are Livingston and Hamilton. Lagoons should not have to worry too much since they only need to meet the status quo. Mike, we may need to work on this.
6) I still disagree with EPA's insistence on 2% MHI being THE threshold. Of course, my opinion probably does not matter much, but let me show you some numbers. Kalispell's water bill increases 239% to get to base criteria. Helena's increases 205%. Havre's goes up 232%. In other words, the wastewater bills more than triple in the three best cases in Montana. The bills go up $505 to $802 per year per average household. That is a hell of a lot of money for one bill out of the stack of bills that a household has to pay off. What money is left over for beer and guns? But seriously, $800 is almost one mortgage payment for Becky and I. So I will agree to disagree with EPA on that point. If we get those towns over 2% then the point is moot.

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